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MEMO ENDORSED

February 8, 2022

Via ECF and E-Mail

Hon. Valerie E. Caproni
United States District Court
Southern District of New York
40 Foley Square, Room 443
New York, New York 10007

USDC SDNY
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DATE FILED: 2/8/2022

Re: United States v. Alain Kaloyeros, No. 16 Cr. 776 (VEC)

Dear Judge Caproni:

We represent Defendant Alain Kaloyeros in the above-captioned action and write, pursuant to the Court's Individual Rule 3.A, to respectfully request leave to file Dr. Kaloyeros' letter motion to stay his self-surrender date (the "Letter Motion") with redactions. The Letter Motion is being submitted to the Court contemporaneously herewith. The Government consents to our request to redact the Letter Motion.

Dr. Kaloyeros' Letter Motion contains discussion of his medical diagnosis and treatment that is unrelated to the charges in this case. Such information is deemed "sensitive" and may be redacted pursuant to Part 21.4 and 21.5 of this Court's Electronic Case Filing Rules & Instructions. *See, e.g., McGuirk v. Swiss Re Fin. Servs. Corp.*, No. 14 CIV. 9516 (CM), 2015 WL 13661685, at *1 (S.D.N.Y. Mar. 30, 2015) ("Medical information is among the types of information often made subject to a sealing order.") As required by the Court's rules, we have provided the Letter Motion to the Court via email with a copy to all counsel of record.

We thank the Court for its consideration in this matter.

Respectfully submitted,

/s/ Michael C. Miller

Michael C. Miller

Counsel for Alain Kaloyeros

cc: All counsel of record

Application GRANTED.

SO ORDERED.



2/8/2022

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE